

REMARKS

I. Introduction

In response to the Office Action dated February 7, 2005, the claims have not been amended. Claims 24-46 remain in the application. Re-examination and re-consideration of the application is requested.

II. Prior Art Rejections

In paragraphs (6)-(7) of the Office Action, claims 24-40 were rejected under 35 U.S.C. §103(a) as being anticipated by Miller et al., U.S. Patent No. 6,512,522 (Miller) and further in view of Solberg et al., U.S. Patent No. 6,134,338 (Solberg). However, in paragraph (18) of the Office Action, claims 41-42 and 44-45 were indicated as being allowable if rewritten in independent form to include the base claim and any intervening claims.

Applicant acknowledges and appreciates the indication of allowable claims, but respectfully traverses the rejection.

Specifically, the independent claims were rejected as follows:

As per claim 24, Miller et al., hereinafter Miller, discloses an apparatus for generating a live video broadcast in which new information to be broadcast develops during said broadcast and said new information is reflected in three dimensional text included with said broadcast comprising:
video signal generation means for generating a live video signal ("The display data may include video data based on images of a video program in which timing effects are applied", column 4, line 1-2);

a text input device and text input receiving means for receiving input text from said text input device (Figure 1 22 User Input and 20 Graphical User Interface);

an object database means arranged to store a template of three dimensional preferences for input text in one or more objects (Figure 1, item 34 3-D Layout and Rendering Module "The three-dimensional layout and rendering module 34 uses the properties 36 and the alpha-numeric character string 26 to generate a set of polygons defining the characters", column 4, line 19-22, and "The processor generally manipulates the data within the integrated circuit memory and then copies the data to the disk after processing is completed", column 5, line 63-66, what is stored in the memory is an object database);

text generating means for generating three dimensional text by formatting said input text in accordance with the three dimensional preferences of said template (Figure 1 34 3-D Layout and Rendering Module); and

combining means arranged to combine said three dimensional text with said live video signal to produce a broadcast signal (Figure 1 "a character generator may be used in conjunction with, or independently from, a video editing system. A character generator receives alphanumeric character input from which image data is generated to be applied to the video data", column 3, line 48-52).

Miller discloses a method for generating a live video broadcast with three-dimensional text. It is noted that Miller does not explicitly disclose "a display means configured to display contents of

the object database for the template in a first window", however, this is known in the art as taught by Solberg et al., hereinafter Solberg. Solberg discloses a method to display a three dimensional document in which contents of the object is displayed (Figure 11, item 187).

Thus, it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teaching of Solberg into Miller because Miller discloses a method for generating a live video broadcast with three-dimensional text and Solberg discloses the content of the display in a window in order for a user to manipulate the object.

As per claim 32, Miller discloses a method for generating a live video broadcast wherein new information to be broadcast in three-dimensional text develops during said broadcast, the method comprising:

- generating a live video signal ("The display data may include video data based on images of a video program in which timing effects are applied", column 4, line 1-2);

- receiving input text from an input device (Figure 1 22 User Input and 20 Graphical User Interface);

- reading a template of three-dimensional preferences, stored in one or more objects, for said input text from an object database (Figure 1, item 34 3-D Layout and Rendering Module, "The three-dimensional layout and rendering module 34 uses the properties 36 and the alpha-numeric character string 26 to generate a set of polygons defining the characters", column 4, line 19-22, and "The processor generally manipulates the data within the integrated circuit memory and then copies the data to the disk after processing is completed", column 5, line 63-66, what is stored in the memory is an object database);

- generating three-dimensional text by formatting said input text in accordance with said three-dimensional preferences of said template (Figure 1 34 3-D Layout and Rendering Module); and

- combining said three-dimensional text with said live video to produce a broadcast signal (Figure 1 "" a character generator may be used in conjunction with, or independently from, a video editing system. A character generator receives alphanumeric character input from which image data is generated to be applied to the video data, column 3, line 48-52).

Miller discloses a method for generating a live video broadcast with three-dimensional text. It is noted that Miller does not explicitly disclose "displaying the three-dimensional preferences of the template in a first window", however, this is known in the art as taught by Solberg. Solberg discloses a method to display a three dimensional document in which contents of the object is displayed (Figure 11, item 187).

Thus, it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teaching of Solberg into Miller because Miller discloses a method for generating a live video broadcast with three-dimensional text and Solberg discloses the content of the display can be display in a window in order for a user to manipulate the object.

Applicant traverses the above rejections. Specifically, neither Miller nor Solberg teach, disclose or suggest a window that displays contents of an object database for a template.

Independent claims 24 and 32 are generally directed to an invention that provides the ability to generate a live video broadcast. Specifically, text input device is used to input text. An object database stores a template of 3D preferences for the input text in multiple objects. A first window is displayed that contains the contents of the object database for a particular template. The input text is then formatted in accordance with the 3D preferences from the object database and is displayed with a live video signal to produce a broadcast signal. The dependent claims provide further

information regarding the first window. Specifically, the window comprises an object number referencing column, an object referencing column, an object type column, and object value column, and a timecode display column. Further, text-based columns in the first window provide a graphical user interface for the user to edit the displayed properties. In addition, the dependent claims provide for displaying a second window upon selecting a particular object in the first window. The second window also comprises multiple columns including a template properties referencing column and a template property value column.

As set forth in the Office Action, Miller fails to teach the claim element of "a display means configured to display the contents of the object database for the template in a first window". This claim element should be broken down into its constituent parts. First, there is a display means. Second, the display means is configured to display specific information in a window. Namely, the display means is configured to display "contents of the object database for the template". Such an object data base (as defined in the previous claim element) consists of or has contents that comprise a template of 3D preferences for input text. Thus, the content of the object database consists of the template of 3D preferences. Accordingly, the claim element (pursuant to the explicit claim language) provides for displaying the 3D preferences for input text.

In rejecting this claim element, the Office Action relies on Solberg Figure 11, item 187. Applicant notes that item 187 is described in col. 17, lines 13-16 as follows:

Alphanumeric text 181 is hereinthroughout also referred to as a third alphanumeric text. Furthermore, a drawing scale 187, as well as, a measurement of units 189 are on the source document 112.

Thus, as used in Solberg, item 187 is a drawing scale. Additional portions of Solberg further provide that 187 is the drawing scale (see col. 17, line 57; col. 25, lines 4, 26, and 54, etc.). Accordingly, while the 3D preferences for input text (i.e., the contents of the object database for a template) are displayed in the present invention, Solberg merely teaches displaying a drawing scale. As illustrated in FIG. 11, Solberg's drawing scale is the real life scale for the CAD drawing. Thus, instead of displaying 3D preferences for input text, Solberg merely displays an actual drawing scale used for a particular CAD drawing. Such a teaching does not even remotely allude to the presently claimed invention.

In addition, Applicant notes that while the present invention displays a property of a template in a window, there is no such template or property of a template displayed in Solberg.

In view of the above, Applicant respectfully requests that the rejection of these independent claims be withdrawn.

In addition to the above, Applicant submits that dependent claims 43 and 46 are allowable over Miller and Solberg. These claims provide that the window provides a graphical user interface for a user to edit the contents of the object data base displayed in the window in text based columns. Thus, the GUI provides text based columns to all the user to edit contents of the object database. In rejecting these claims, the Office Action relies on Solberg stating:

Solberg further discloses the first window provides a graphical user interface for a user to edit the contents of the object database displayed in the first window in text based columns (Figure 12, item 130 where the drawing can be set up).

Applicant notes that FIG. 12 does provide for setting up a drawing. However, FIG. 12 lacks any description, explicit or implicit, of text based columns that are used to edit an object database. Instead, FIG. 12 merely shows parameters displayed on a screen. Applicant also submits that col. 50, lines 22-48 which describes FIG. 12 does not even remotely allude to text based columns. Under MPEP §2142 and 2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." In rejecting the claims, the terms "text based columns" were merely ignored and were not considered. Accordingly, the Office Action has failed to establish a *prima facie* case of obviousness. Applicant submits that not only must these terms be considered, but the prior art completely fails to teach or suggest such a graphical user interface.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Miller and Solberg. In addition, Applicant's invention solves problems not recognized by Miller and Solberg.

Thus, Applicant submits that independent claims 24 and 32 are allowable over Miller and Solberg. Further, dependent claims 25-31 and 33-46 are submitted to be allowable over Miller and Solberg in the same manner, because they are dependent on independent claims 24, and 32,

respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 25-31 and 33-46 recite additional novel elements not shown by Miller and Solberg.

III. Conclusion

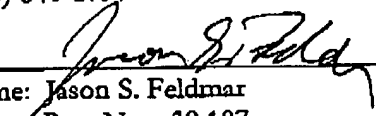
In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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